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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
THOMAS J. PARDINI IN SUPPORT
OF DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR PRECIS
IN SUPPORT OF REQUEST TO FILE
MOTION IN LIMINE TO EXCLUDE
TESTIMONY AND OPINIONS OF
WAYMO EXPERT
LAMBERTUS HESSELINK OPINION
ON TS 25**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Defendants' Administrative Motion to File
6 Under Seal Their Precis in Support of Request to File Motion in Limine to Exclude Testimony
7 and Opinions of Waymo Expert Lambertus Hesselink Opinion on TS 25.

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Precis in Support of Request to File Motion in Limine ("Precis")	Highlighted Portions	Defendants (Blue) Plaintiff (Green)

14 3. The blue-highlighted portions of the Precis contain highly confidential technical
15 information considered by an Uber engineer. This highly confidential information is not publicly
16 known. I understand that disclosure of this information could allow competitors to understand a
17 former head of Uber ATG's thinking with respect to self-driving technology.

18 4. The green-highlighted portions of the Precis contains information that has been
19 designated "Highly Confidential – Attorneys' Eyes Only" or "Confidential" by Waymo in
20 accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"),
21 which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6).
22 Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective
23 Order.

5. Defendants' request to seal is narrowly tailored to the portions of their Precis that merits sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of November, 2017 at San Francisco, California.

Thomas J. Pardini

ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has concurred in this filing.

Dated: November 10, 2017

MICHAEL A. JACOBS